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<p>1 didn't do but.</p> <p>2 MR. SIMOPOULOS: He said Commonwealth's</p> <p>3 Attorney but.</p> <p>4 MR. PURICELLI: Sorry. Commonwealth's</p> <p>5 Attorney.</p> <p>6 BY MR. PURICELLI:</p> <p>7 Q Who was it that called the Commonwealth's</p> <p>8 Attorney?</p> <p>9 A I believe it was Detective Lawson.</p> <p>10 Q And you weren't present for that</p> <p>11 communication?</p> <p>12 A I don't believe so, sir. I don't recall.</p> <p>13 Q Do you recall if Lawson made a phone call,</p> <p>14 teletype, letter or how he communicated?</p> <p>15 A I believe it was a phone call.</p> <p>16 Q Do you recall anything of what Lawson may</p> <p>17 have represented of what he told the Commonwealth's</p> <p>18 Attorney?</p> <p>19 A I don't recall being privy to that</p> <p>20 conversation or the content of it. Just the notes</p> <p>21 that he made about it that I was able to review.</p> <p>22 Q Aside from the written notes that we have</p> <p>23 you don't recall anything else him specifically</p> <p>24 saying or left on the field notes?</p> <p>25 A I don't recall, sir.</p>	<p>1 supervise this particular unit?</p> <p>2 A Not that I recall. Just basically</p> <p>3 investigating crimes of that nature. Not</p> <p>4 necessarily supervision of the unit.</p> <p>5 Q Was there any specialized training to be a</p> <p>6 supervisor?</p> <p>7 A Yes. I've been to a few leadership</p> <p>8 classes. I don't recall specific dates or times.</p> <p>9 It's been more than one.</p> <p>10 Q Okay. With respect to the Bush incident,</p> <p>11 as I'm going to refer to it, you gave me four</p> <p>12 categories: Domestic violence, crimes against</p> <p>13 children, runaways and missing persons. Were there</p> <p>14 any other category activities that you use in that</p> <p>15 unit?</p> <p>16 A Every once in a while we'll catch</p> <p>17 something that doesn't fall neatly into one of those</p> <p>18 categories.</p> <p>19 Q Can we agree we'll call that miscellaneous</p> <p>20 category? Would that be fair for the purposes of</p> <p>21 this deposition?</p> <p>22 A Right.</p> <p>23 Q You've already identified it as one that</p> <p>24 doesn't fit neatly into one of the other four.</p> <p>25 Would there be any other type of classification of</p>
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<p>1 Q As a result of his communication with the</p> <p>2 Commonwealth's Attorney did he come back and report</p> <p>3 to you what he had been instructed or advised?</p> <p>4 A I believe we spoke about it. He indicated</p> <p>5 that he had consulted juvenile court, and that it</p> <p>6 appeared to be a valid order from Pennsylvania.</p> <p>7 Q And what unit were you working?</p> <p>8 A Youth and Family Crimes Team.</p> <p>9 Q And what is that unit?</p> <p>10 A You're asking me the composition of it?</p> <p>11 Q Basically. What is the purpose of the</p> <p>12 unit?</p> <p>13 A The purpose of the unit is to investigate</p> <p>14 missing persons, crimes against children, crimes</p> <p>15 committed by children, domestic violence.</p> <p>16 Q Was any specialized training provided to</p> <p>17 you to work that unit and supervise that unit?</p> <p>18 A Yes.</p> <p>19 Q And was that training to work the unit?</p> <p>20 A Certain aspects of it: Missing persons,</p> <p>21 runaways. Domestic violence is an ongoing topic</p> <p>22 that we discover and service on a regular basis.</p> <p>23 Crimes against children I've been to conferences</p> <p>24 for.</p> <p>25 Q Was there any specialized training to</p>	<p>1 activities your unit would look into?</p> <p>2 A I'm not sure what you're referring to.</p> <p>3 Like sex crimes or something of that nature?</p> <p>4 Q I'm just looking to see what you and that</p> <p>5 unit principally handle so that I can either exclude</p> <p>6 those categories in this deposition and find out</p> <p>7 what you actually focused on.</p> <p>8 A I'm not sure. Do you want me to enumerate</p> <p>9 every sort of crime we investigate?</p> <p>10 Q Let's try it this way and see if we can</p> <p>11 shorten this up. With the Bush incident how would</p> <p>12 you classify that incident for the purposes of your</p> <p>13 report in your reporting system?</p> <p>14 A Ultimately, it's investigated as an</p> <p>15 abduction.</p> <p>16 Q Why was it classified that?</p> <p>17 A Because of the facts and circumstances</p> <p>18 that were developed.</p> <p>19 Q And what facts did you develop to indicate</p> <p>20 that it was an abduction?</p> <p>21 A Person without a valid, a person without</p> <p>22 the legal right legitimately obtained carried three</p> <p>23 children, noncustodial parent, across state lines.</p> <p>24 Q Okay. And were there any other facts</p> <p>25 other than those you just described that you relied</p>

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<p>1 on to classify David Bush's removal of the children 2 as an abduction? 3 A I'm sure there were other facts. 4 Q Do they appear in the paperwork? 5 A At some point, yes. 6 Q So I could read them and see what other 7 facts in your missing children's report? 8 A (No response.) 9 Q I don't want to make you recall things 10 that I can read is all I'm saying. 11 A There are other facts that are involved in 12 the case that may not be in here. I'm not saying 13 that there's 100 percent everything is written down. 14 Q Okay. I'm just looking for the facts to 15 have it classified as an abduction. That's all. 16 A I'm not sure I can answer that because I 17 don't know exactly what you're saying. 18 MR. SIMOPOULOS: Just clarify or rephrase 19 it. 20 MR. PURICELLI: Sure. I can rephrase it. 21 I'll ask it a different way. 22 BY MR. PURICELLI: 23 Q You indicated to us that the Bush matter 24 we're talking about was classified in your unit as 25 an abduction?</p>	<p>1 year. The content of the court order that I was 2 given indicated that she had some nexus with Luzerne 3 County which was found out to be untrue. She 4 provided the vacate order of the, the order from 5 Luzerne County. I vaguely recall mention of a 6 weapon or firearm being involved. And I believe 7 there was also some discussion about the location of 8 the children being in Pennsylvania, possible 9 locations for Mr. Bush where he lived, and that the 10 children were with him, and some domestic violence 11 previously that had occurred some years ago between 12 the two parties: Mr. and former Ms. Bush. 13 Q Anything else? 14 A That's all I can recall at this time. 15 Q You indicated that she had told you there 16 were weapons and a firearm involved? 17 A Possible firearm involved. 18 Q In regards to what? 19 A In possessing one and the children being 20 afraid of him or something along those lines. 21 Q So when she told you about the weapon or 22 firearm she was merely telling you he owned them? 23 Or was he using them in some manner that was 24 contrary to law? 25 MR. SIMOPOULOS: Objection to form.</p>
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<p>1 A Right. 2 Q And you've given me some factors and 3 you've indicated there are others possibly why you 4 classified this incident as an abduction. Does that 5 help you understand what I'm asking about? 6 A All right. There's some content of 7 conversation that I had with the victim, the victim 8 being the mother of the children, which was not 9 reduced to writing which did have bearing on the 10 material facts to whether this would constitute an 11 abduction. 12 Q Why don't you tell me what she told you. 13 MR. SIMOPOULOS: You're asking why it was 14 classified as an abduction; right? 15 MR. PURICELLI: Yes. And he's telling me 16 the mother told him some other things other 17 than these. And I have to get it off his mind 18 right now because apparently he might be able 19 to think of others so let's get that off his 20 mind. 21 BY MR. PURICELLI: 22 Q Why don't you tell me what the mother told 23 you. 24 A All right. She told me that she had lived 25 in Pennsylvania for quite some time, at least a</p>	<p>1 THE WITNESS: (Reviews documents.) That 2 he may be armed with a 45 caliber firearm. 3 BY MR. PURICELLI: 4 Q So the conversation that you had with her, 5 this was after the children had already been turned 6 over to Mr. Bush pursuant to a Virginia Court Order? 7 A Sir, what was the question? 8 Q The information that you're telling me, 9 the conversation that you had with the mother, this 10 was occurring after Mr. Bush had left Virginia -- 11 A Yes, sir. 12 Q -- with the children pursuant to a 13 Virginia Court Order? 14 A Not pursuant to a Virginia Court Order 15 that I know of. It was pursuant to the Pennsylvania 16 Court Order. 17 Q You're not aware that there was a Virginia 18 Family Court Order? 19 A I'd have to look back through my notes. 20 But at the time, no. I was not aware that there was 21 a Virginia Court Order. 22 Q Can you check the file and see if there 23 was any indication in there that the Virginia Family 24 Court had authorized Mr. Bush to remove the 25 children?</p>



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<p>1 A (Reviews documents.) No. There's nothing 2 in my file to indicate that Mr. Bush had a valid 3 Virginia Court Order. 4 Q Okay. What is the policy, if there is a 5 policy in the police department, for going to any 6 schools to pick up children from school and turn 7 them over to a parent who would be from out of 8 state? 9 A You're asking me what the policy is? 10 Q Yes. 11 A We don't typically deal with that a lot. 12 But what we do interpret is who has the valid right 13 to custody of the child. Now, whether you know, 14 whether they're picking them up from school or 15 whether they're picking up from another location and 16 we're asked to facilitate transfer of children or a 17 child, that's our primary function. 18 Q Were you aware that the Richmond Police 19 Department actually were the ones that picked up the 20 children at their school in Richmond, Virginia and 21 brought them back to the police station and turned 22 them over to Mr. Bush? 23 A Yes, I was. 24 Q In that fact scenario what was the policy 25 of the police department in turning a child over to</p>	<p>1 or the parent from Pennsylvania has a valid court 2 order? 3 A That -- 4 MR. SIMOPOULOS: Objection. Speculation. 5 Go ahead. 6 THE WITNESS: I'd probably have to get 7 some legal advice on that. I would call the 8 Commonwealth's Attorney's Office. 9 BY MR. PURICELLI: 10 Q And in this sort of fact scenario Lawson 11 has already contacted the Commonwealth's Attorney? 12 A In this case, yes. 13 Q Did you learn what that advise was from 14 the Commonwealth's Attorney? 15 A I found out at some point. 16 Q At what point? 17 A That part I don't recall. 18 Q Was it before or after the warrants was 19 issued for Mr. Bush's arrest? 20 A I believe it was prior to custody. 21 Q Prior to what custody? 22 A Prior to custody of the children. I say 23 that I'm not certain because I don't remember the 24 exact time and date that we discussed it. But for 25 us to be involved at that level it would have had to</p>
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<p>1 a parent who's from Pennsylvania or out of state? 2 A What I was led to believe at the time was 3 that we were returning children to an individual who 4 had valid right to custody of them based upon a 5 document from out of state which appeared to be 6 valid. 7 Q For the purposes of this question let's 8 assume that he did not have a valid court order nor 9 did the mother. Neither had a valid court order for 10 custody of the children. What rights under your 11 training and policy of the police department did 12 Mr. Bush have to be with his children? 13 MR. SIMOPOULOS: Objection to form. 14 BY MR. PURICELLI: 15 Q If you understand it you can answer it. 16 A I'm not sure I follow what you're asking 17 me to speculate on. 18 Q No. I'm not asking you to speculate. 19 Just tell me based on your training and your 20 policies at the police department how police 21 officers would handle that matter. 22 A If parents are divorced and one from out 23 of state wants to come pick up their kid from 24 school? 25 Q And neither the parent living in Virginia</p>	<p>1 have been on the advice, the pre advice of the 2 Commonwealth's Attorney's Office pre custody, before 3 we went and picked up the children and returned them 4 to Mr. Bush. 5 Q And the warrants that were issued against 6 Mr. Bush occurred after that period of time; is that 7 right? 8 A Yes, sir. 9 Q So you knew when the warrants were issued 10 that the Commonwealth's Attorney had instructed the 11 Richmond Police to allow Mr. Bush to leave with the 12 children. Is that true? 13 A There were a whole different set of 14 circumstances based upon -- 15 Q Answer my question and I'll listen to you. 16 MR. SIMOPOULOS: Objection to the form. 17 THE WITNESS: Can I get the question one 18 more time? 19 MR. PURICELLI: Absolutely. 20 BY MR. PURICELLI: 21 Q Is it true that at the time the warrants 22 were issued for Mr. Bush's arrest for abduction of 23 these children you and the Richmond Police 24 Department had received advice from the 25 Commonwealth's Attorney to allow him to return to</p>

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<p>1 Pennsylvania with the children?</p> <p>2 A We received advice from the Commonwealth's</p> <p>3 Attorney. It changed again as to what their advice</p> <p>4 was at one point in time. By the time that the</p> <p>5 children were turned over to Mr. Bush, and then the</p> <p>6 advice changed before I obtained the warrants.</p> <p>7 Q Fair enough. Okay. So at what point in</p> <p>8 time did you recontact -- and I don't mean you</p> <p>9 personally -- but was there contact with the</p> <p>10 Commonwealth's Attorney? Was it after Mr. Bush had</p> <p>11 already left the Commonwealth of Virginia?</p> <p>12 A Yes.</p> <p>13 Q And why did there become a need to</p> <p>14 recontact the Commonwealth's Attorney?</p> <p>15 A Because it was determined that the order</p> <p>16 was vacated for reasons after he left the</p> <p>17 Commonwealth, that there were some material issues</p> <p>18 with the original order that needed to be addressed,</p> <p>19 and that based upon the totality of the</p> <p>20 circumstances constituted abduction.</p> <p>21 Q And is that a conclusion you personally</p> <p>22 reached? Or is that a conclusion reached by another</p> <p>23 person and it was told to you?</p> <p>24 A I was consulted -- I consulted with the</p> <p>25 Commonwealth's Attorney.</p>	<p>1 A Yes. And worked with her. I mean, not in</p> <p>2 the same office or anything but on other cases.</p> <p>3 Q Were they cases of similar factual</p> <p>4 scenarios we've been discussing in the Bush case?</p> <p>5 A I don't recall.</p> <p>6 Q Okay. Who called who?</p> <p>7 A I don't recall. I probably called her</p> <p>8 though.</p> <p>9 Q Okay. And what if anything did you tell</p> <p>10 her?</p> <p>11 A The facts and circumstances.</p> <p>12 Q And those are the facts and circumstances</p> <p>13 that we've been talking about today?</p> <p>14 A Yes, sir.</p> <p>15 Q Are there any others that you would have</p> <p>16 told her that we haven't discussed today?</p> <p>17 A Not that I recall.</p> <p>18 Q Okay. And what advice did she give you?</p> <p>19 A We received advice that there was -- I say</p> <p>20 we. Lieutenant Russell and I received advice that</p> <p>21 facts and circumstances could constitute an</p> <p>22 abduction.</p> <p>23 Q Did she say could or did?</p> <p>24 A I don't recall.</p> <p>25 Q At the time that you received the advice</p>
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<p>1 Q You say you, you personally?</p> <p>2 A I would say I was in consultation. I was</p> <p>3 part of the conversations with the Commonwealth's</p> <p>4 Attorney's Office.</p> <p>5 Q And was that before or after Serene</p> <p>6 provided you with a copy of the vacated Luzerne</p> <p>7 County Pennsylvania Court Order?</p> <p>8 A That was after.</p> <p>9 Q Who did you talk to in the Commonwealth's</p> <p>10 Attorney's Office?</p> <p>11 A Mary Langer.</p> <p>12 Q Did you know her?</p> <p>13 MR. SIMOPOULOS: Objection to form.</p> <p>14 BY MR. PURICELLI:</p> <p>15 Q Prior to speaking that date had you had</p> <p>16 conversations with her to know you were taking to</p> <p>17 Mary Langer?</p> <p>18 A Yes, sir.</p> <p>19 Q Okay. And how did you know you were</p> <p>20 talking with Mary Langer, what experience?</p> <p>21 A I recognized her voice.</p> <p>22 Q Had you worked with her before or sought</p> <p>23 advice?</p> <p>24 A Yes.</p> <p>25 Q You sought advice from her?</p>	<p>1 that there could be an abduction did you tell --</p> <p>2 MR. SIMOPOULOS: Objection to form.</p> <p>3 MR. PURICELLI: I don't want to say</p> <p>4 anything incorrect.</p> <p>5 BY MR. PURICELLI:</p> <p>6 Q Did she tell you it could be an abduction</p> <p>7 or would be an abduction?</p> <p>8 MR. SIMOPOULOS: Objection. Asked and</p> <p>9 answered.</p> <p>10 BY MR. PURICELLI:</p> <p>11 Q You can answer that.</p> <p>12 A I don't recall the exact verbiage that she</p> <p>13 used, but there was implication that abduction</p> <p>14 warrants could be sought from the magistrate.</p> <p>15 Q Did you place the substance of this phone</p> <p>16 call down on any document? In other words, did you</p> <p>17 write a report that indicated that I called the</p> <p>18 Commonwealth's Attorney and the following</p> <p>19 information was provided, and the following advice</p> <p>20 was given? Anything like that?</p> <p>21 A No, sir. I didn't.</p> <p>22 Q In the course of your training as a</p> <p>23 supervisor did you receive training about note</p> <p>24 taking and preparing a complete file?</p> <p>25 A Yes, I did.</p>



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<p>1 Q Did that training also include notes as to</p> <p>2 information that you received to allow you to</p> <p>3 explain why you took a course of action?</p> <p>4 A Yes.</p> <p>5 Q Is there a reason you don't have that note</p> <p>6 in your file now of that conversation?</p> <p>7 A No. There's no reason. Just went to the</p> <p>8 magistrate's office pretty much right from that</p> <p>9 phone call.</p> <p>10 Q I'm going to tell you right off the bat I</p> <p>11 don't know about Virginia law and procedure on</p> <p>12 obtaining warrants. Can you tell me the procedure</p> <p>13 that Virginia uses for an officer to obtain a</p> <p>14 warrant of arrest from a magistrate?</p> <p>15 A Well, the officer takes the facts and</p> <p>16 circumstances to the magistrate, appears in person</p> <p>17 usually or via teleconferencing to the magistrate,</p> <p>18 states the facts and circumstances of a particular</p> <p>19 incident, and the magistrate either issues or does</p> <p>20 not issue a warrant based upon those facts and</p> <p>21 circumstances after sworn testimony is provided.</p> <p>22 Q Is the procedure recorded when you appear</p> <p>23 in front of a magistrate? Is it on the record? Is</p> <p>24 there an actual writing or document as to what you</p> <p>25 tell the magistrate are the facts and circumstances?</p>	<p>1 Q Is that the signature of the person you're</p> <p>2 describing as Nardella?</p> <p>3 A Yes, sir.</p> <p>4 Q And do you recognize that being the</p> <p>5 signature of the magistrate named Nardella?</p> <p>6 A I don't know what his signature looks</p> <p>7 like. And it comes up automatically on the warrant.</p> <p>8 Or maybe they sign it.</p> <p>9 Q Where do you physically go to do this</p> <p>10 presentment?</p> <p>11 A It's 200 West Grace Street is where the</p> <p>12 magistrate's office is. Police Headquarters.</p> <p>13 Q Is there more than one magistrate in that</p> <p>14 building?</p> <p>15 A Yes, sir.</p> <p>16 Q How many are there?</p> <p>17 A I don't know how many there are. At least</p> <p>18 eight of them.</p> <p>19 Q How did you come to appear before this</p> <p>20 magistrate?</p> <p>21 A Subsequent to consulting the</p> <p>22 Commonwealth's Attorney's Office I went downstairs</p> <p>23 and obtained a warrant after relaying the facts and</p> <p>24 circumstances to Mr. Nardella.</p> <p>25 Q How did you come to chose among the eight,</p>
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<p>1 A I don't believe so.</p> <p>2 Q So is it you appear in front of the person</p> <p>3 yourself, typically you seeking a warrant in this</p> <p>4 case, and simply tell the person in front of you?</p> <p>5 A Basically that's how it goes.</p> <p>6 Q Is it under oath?</p> <p>7 A Yes, sir.</p> <p>8 Q Was it you who appeared in front of the</p> <p>9 magistrate to obtain the warrants?</p> <p>10 A Yes, sir.</p> <p>11 Q And what magistrate did you go to?</p> <p>12 A (Reviews documents.) Looks like</p> <p>13 Magistrate Nardella. N-A-R-D-E-L-L-A.</p> <p>14 Q Have you been in front of this magistrate</p> <p>15 before?</p> <p>16 A I believe so.</p> <p>17 Q Is that the last name?</p> <p>18 A Well, I mean, I'm not sure exactly how you</p> <p>19 spell it, but that's what it looks like on here.</p> <p>20 Q You're looking at what we've already</p> <p>21 identified as Adams 2, one of the warrants?</p> <p>22 A Yes. A box checked, Magistrate.</p> <p>23 Q And above that appears to be a signature</p> <p>24 of somebody?</p> <p>25 A Yes.</p>	<p>1 this particular magistrate?</p> <p>2 A That's just who was on duty at the time.</p> <p>3 Q When you appeared before him was it during</p> <p>4 regular business hours or was it after hours?</p> <p>5 A Magistrate's hours run 24 hours a day.</p> <p>6 Q Forgive my ignorance. I know little about</p> <p>7 Virginia law. So you have a magistrate available to</p> <p>8 you 24 hours a day?</p> <p>9 A Yes, sir.</p> <p>10 Q Do the magistrates do anything other than</p> <p>11 review for warrants?</p> <p>12 A They do bond hearings.</p> <p>13 Q Do they actually do court proceedings</p> <p>14 meaning other than setting bonds or anything like</p> <p>15 that?</p> <p>16 A Not actual court proceedings. They issue</p> <p>17 protective orders, emergency protective orders, they</p> <p>18 issue green warrants or emergency custody orders.</p> <p>19 Q At the time when you appeared before this</p> <p>20 magistrate were any notes or recordings taken of</p> <p>21 what you were telling the judge?</p> <p>22 MR. SIMOPOULOS: Objection to form.</p> <p>23 BY MR. PURICELLI:</p> <p>24 Q When you were present did he just listen,</p> <p>25 or did he tape record?</p>

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<p>1 A Not that I know of.</p> <p>2 Q Was he writing anything when you were</p> <p>3 appearing in front of him?</p> <p>4 A I don't recall.</p> <p>5 Q Okay. Did you personally appear in front</p> <p>6 of him?</p> <p>7 A Yes, sir.</p> <p>8 Q Okay. Aside from what you told me today</p> <p>9 were the facts and circumstances did you tell him</p> <p>10 anything different?</p> <p>11 A I don't recall. I mean, I don't recall</p> <p>12 the exact content of the conversation.</p> <p>13 Q Did you have a conversation with him</p> <p>14 before giving him the facts and circumstances about</p> <p>15 why you were there?</p> <p>16 A I don't believe so.</p> <p>17 Q Did you have a conversation after</p> <p>18 obtaining the warrants with him about this matter?</p> <p>19 A I believe I just left after I obtained the</p> <p>20 warrants.</p> <p>21 Q Did you have any conversation with him</p> <p>22 after obtaining the warrants about this case?</p> <p>23 A I don't believe so. I really don't</p> <p>24 recall.</p> <p>25 Q Before you went down and obtained the</p>	<p>1 to him on just one occasion. Maybe more. But I</p> <p>2 don't recall the content of the conversation.</p> <p>3 Q Was the conversation occurring after</p> <p>4 Mr. Bush left Virginia with the children but before</p> <p>5 you obtained the warrants for his arrest?</p> <p>6 A I don't know. I just don't remember.</p> <p>7 Q Was he the only person you spoke to from</p> <p>8 Pennsylvania about the Bush matter?</p> <p>9 A I believe so.</p> <p>10 Q Did you speak with a Trooper McDermott in</p> <p>11 the Montoursville Barracks?</p> <p>12 A I don't believe so.</p> <p>13 Q Were you the only person working on the</p> <p>14 case to bring the abduction charges which I believe</p> <p>15 were actually classified as kidnapping charges?</p> <p>16 A No, I was not. I was being assisted by</p> <p>17 Lieutenant Russell.</p> <p>18 Q Were you supervising Lieutenant Russell?</p> <p>19 A No, sir. He was my direct supervisor.</p> <p>20 Q Are you familiar with what he was doing</p> <p>21 before the warrants were issued but after Mr. Bush</p> <p>22 left in regards specifically to the Bush case?</p> <p>23 A I don't recall exactly what he was doing.</p> <p>24 Q What do you recall in general?</p> <p>25 A I remember he was communicating with</p>
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<p>1 warrants had you communicated with anybody from</p> <p>2 Pennsylvania in regards to obtaining the warrants?</p> <p>3 A Had I communicated with anybody in</p> <p>4 Pennsylvania before obtaining the warrants?</p> <p>5 Q Yes.</p> <p>6 A Yes, I believe I did.</p> <p>7 Q Who did you speak with?</p> <p>8 A I believe I spoke with a Sergeant Tripp on</p> <p>9 one occasion.</p> <p>10 Q Is Sergeant Tripp from the Pennsylvania</p> <p>11 State Police?</p> <p>12 A Yes, I believe so.</p> <p>13 Q Do you have any records or notes created</p> <p>14 or have been created by other people in regards to</p> <p>15 that communication with Sergeant Tripp with the</p> <p>16 Pennsylvania State Police?</p> <p>17 A No, I don't.</p> <p>18 Q Did you contact him or did he contact you?</p> <p>19 A That I don't recall.</p> <p>20 Q What was the nature of the communication?</p> <p>21 In other words, what information was exchanged?</p> <p>22 A I don't exactly recall what we were</p> <p>23 speaking about. It was possible -- I mean, I would</p> <p>24 be speculating at this point, but it was about</p> <p>25 Mr. Bush and -- I just don't recall. I only spoke</p>	<p>1 either folks in Pennsylvania or the FBI. I don't</p> <p>2 remember which.</p> <p>3 Q What did Sergeant Tripp tell you?</p> <p>4 A I don't recall.</p> <p>5 Q What did you tell him?</p> <p>6 A I just remember speaking to him. I don't</p> <p>7 remember what the content of the conversation was.</p> <p>8 Q Assuming you called him how would you know</p> <p>9 who to contact?</p> <p>10 MR. SIMOPOULOS: Objection to form. You</p> <p>11 can answer it.</p> <p>12 THE WITNESS: I don't know how I</p> <p>13 ultimately ended up with him on the phone. But</p> <p>14 like I said, I don't know if he contacted me or</p> <p>15 if I contacted him. I just don't remember.</p> <p>16 BY MR. PURICELLI:</p> <p>17 Q It's not indicated anywhere in your</p> <p>18 report?</p> <p>19 A I had made a note that I had spoken to</p> <p>20 Tripp on -- there's no specific date mentioned, but</p> <p>21 just that I had spoken to him on at least one</p> <p>22 occasion and that was it.</p> <p>23 Q And this is the note you can't find?</p> <p>24 A It was jotted down in the margin of one of</p> <p>25 these pages (indicates.)</p>